

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF New York

ODILON S. CELESTIN, WIDMIR
ROMELIEN, MARIE LUCIE ST VIL,
GORETTIE ST VIL, JEANNETTE VALEUS,
GUETTY FELIN, HERVE COHEN, and on
behalf of all others similarly situated,

Plaintiffs,

- against -

MICHEL JOSEPH MARTELLY, JOCELERME
PRIVERT, JOVENEL MOISE, THE WESTERN
UNION COMPANY, d/b/a Western Union
Holdings, Inc, Western Union Financial Services,
Inc., and through other subsidiaries and affiliates,
CARIBBEAN AIR MAIL, INC., d/b/a CAM,
UNIBANK, S.A., UNITRANSFER USA, INC.,
UNIGESTION HOLDING, S.A., d/b/a
DIGICEL HAITI, NATCOM S.A., and THE
GOVERNMENT OF HAITI,

Defendants.

18-cv-7340 (LDH) (PK)

ECF CASE

**DECLARATION OF ANDRE
LARGIE**

Andre Largie declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true:

1. I am the regional director for Western Union's business in the Caribbean, including Haiti.
2. I make this declaration in support of Western Union's motion to dismiss Plaintiffs' Second Amended Complaint.
3. I understand that this lawsuit concerns a fee imposed by the government of Haiti through two Circulars issued in 2011, which imposed a \$1.50 fee on all money transfers to and from Haiti (the "Fee").
4. Western Union offers its retail money transfer services through its global network of agent locations. Cash remittances to or from Haiti are received at or sent from Western Union money transfer agent locations in Haiti.
5. Since it was imposed in 2011, to the best of my knowledge, the Fee has been segregated and remitted to the BRH by Western Union's master agents in Haiti.
6. The money transfer agents' records concerning their segregation and remittance of the Fee to the BRH are maintained by the money transfer agents in Haiti.
7. Western Union does not retain, and has never retained, any portion of the Fee.

Dated: Atlanta, Georgia
May 10, 2019


Andre Largie